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GARY E. KNELL
Senior Vice President
for Corporate Affairs

December 13, 1994

David R. Siddall, Esq.
Office of Commissioner Susan Ness
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Dear Mr. Siddall:

David —

It was a pleasure to meet you recently, and to catch up on the regulatory picture at the Commission.

We appreciated the opportunity to discuss the suggestions of CTW regarding (i) the definition of "core" programming in connection with the implementation of the Children's Television Act and (ii) the provision of incentives to stimulate children's educational programming in connection with the cable "going forward" rules.

The Commission's actions implementing the Children's Television Act will make a decisive difference to the future of programming that offers constructive alternatives to the overwhelming preponderance of entertainment-only programming for children. Already, we sense a growing hesitation at the networks with respect to educational programs. We understand the complexity of issues and competing interests which must be balanced by the Commission, but believe that our proposals strike an appropriate balance.

In response to commercial broadcasters' assertion that "educational" children's programs are not commercially viable, we strongly assert that this is simply untrue. Attached are the ratings documents we've used in support of both Cro and Ghostwriter in recent presentations. These ratings speak directly to the fact that these two programs certainly hold their own with competitive other "entertainment" programs.

Additionally relevant is the fact that the networks are paying license fees for the educational entries equal to or less than other programs on their schedules. Thus, the argument that adding educational

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content expertise or research is uneconomical for the networks is without merit since it is the producers who are picking up those additional costs, if any, related to these "qualifying" educational programs. Thus, Cro, in its 2nd season on ABC, is being licensed at the standard rate (\$291,200 per episode) and CTW is responsible for the remainder of costs (another \$100,000 plus). Similarly we recently pitched a new kids' educational game show called Dr. Brain to the networks, and on a per episode basis, it would cost the network the same or less than other competitive programs (approximately \$80,000 per episode cost to the networks).

Specifically, in the case of a proposed definition of "core" programming, CTW believes that adoption of its proposed three-pronged test -- stated curriculum, independent advisors, and research -- would increase the quantity and quality of children's educational programming without requiring that the Commission make substantive assessments of program content or create unnecessary burdens on licensees. In fact, many producers and broadcasters already use expert advisors and written educational goal statements to assist in creating qualifying children's television programming.

Reluctantly, at this critical juncture, it appears to us that some quantitative requirement appears necessary as the broadcasters interpret the regulatory deliberations as disinterest from Washington. This "disinterest" leads to a lack of attention at the broadcasters' level and makes the work of children's producers of educational programs that much more difficult in breaking the "uneconomic" myths.

Finally, regarding the cable going-forward rules, CTW believes that, by providing economic incentives to cable operators to carry children's educational programming on cable program service tiers, its recommendation would move toward creating a home for children's educational programming in the ever more cluttered environment of the 500-plus channel universe, available and responsive to children of all ages and income levels. In this regard, CTW believes that the exception for minority and educational programming contained in the leased access rules (Section 76.977 of the Commission's Rules) provides ample precedent for the Commission to create incentives to encourage programming from qualified educational and minority programming sources.

CTW stands ready to provide you with further assistance regarding these matters. Thank you again for your interest and support and pass along our best wishes for the holidays to Commissioner Ness.

Sincerely,



Gary E. Knell

Enclosure
cc w/encl.:

Barbara K. Gardner, Esq.

CRO

September 5-October 23, 1994 (7 Weeks)

SEASON TWO:

8 AM		Households		Children 6-11		Girls 6-11		Boys 6-11	
		AA	Shr	AA	Shr	AA	Shr	AA	Shr
ABC	CRO	1.6	9	3.0	17	2.4	17	3.6	18
CBS	LITTLE MERMAID	1.7	9	2.0	13	2.6	19	1.8	9
FOX	DOG CITY	2.3	11	5.1	26	3.1	23	7.0	37

OTHER SCIENCE BASED PROGRAMS:

CBS	BEAKMAN'S WRLD (12 PM)	2.0	7	2.2	11	2.4	13	2.0	10
SYN	BILL NYE	1.3		1.6		1.4		1.7	

- ① BASED ON TELEVISION HOUSEHOLDS, CRO PERFORMED COMPARABLY TO DISNEY'S LITTLE MERMAID. HOWEVER, DOG CITY CONTINUES TO HOLD THE NUMBER ONE POSITION FOR THE TIME SLOT
- ② AMONG CHILDREN 6-11, CRO OUTPERFORMED DISNEY'S LITTLE MERMAID AND CAME IN SECOND TO DOG CITY.
- ③ COMPARED TO THE OTHER COMMERCIAL SCIENCE BASED CHILDREN'S PROGRAMS, CRO CONSISTANTLY DELIVERED MORE CHILDREN 6-11 THAN EITHER BEAKMAN'S WORLD OR BILL NYE. AMONG GIRLS 6-11, CRO OUTPERFORMED BILL NYE AND PERFORMED COMPARABLY TO BEAKMAN'S WORLD.

SEASON ONE FOR THE SAME PERIOD:

8 AM		Households		Children 6-11		Girls 6-11		Boys 6-11	
		AA	Shr	AA	Shr	AA	Shr	AA	Shr
ABC	CRO	1.8	10	3.1	19	2.5	18	3.7	19
CBS	MARSUPIAMI	1.4	8	2.2	13	1.7	13	2.7	14
FOX	DOG CITY	1.7	9	3.8	23	2.4	18	5.0	26

OTHER SCIENCE BASED PROGRAMS:

CBS	BEAKMAN'S WRLD (12 PM)	2.2	7	2.1	10	1.8	10	2.4	10
SYN	BILL NYE	1.7		1.9		1.6		2.3	

- ④ OVERALL, FEWER HOUSEHOLDS TUNED TO COMMERCIAL SCIENCE-BASED CHILDREN'S PROGRAMS IN SEASON TWO. THE NUMBER OF VIEWERS 6-11 WERE COMPARABLE.
- ⑤ FOR DOG CITY, THERE WAS A SIGNIFICANT INCREASE IN HOUSEHOLDS AND CHILDREN 6-11 THIS YEAR WHEN COMPARED TO LAST YEAR.
- ⑥ FROM LAST YEAR TO THIS YEAR, CRO IS RETAINING ITS GIRLS 6-11 AND BOYS 6-11 AUDIENCE.

SOURCE: NIELSEN MEDIA RESEARCH



RATINGS FACTSHEET

ENDING SEASON TWO

(09/12/93 - 04/17/94)

NATIONAL AVERAGE AUDIENCE

Average Audience rating (AA%) is the percent of TV households or persons tuned to a program in an average minute.

CARRIAGE

GHOSTWRITER is carried by over 300 PBS stations--96% of the total US. television households.

NATIONAL AA RATINGS FOR SEASON TWO

Season Average:

The average rating for children 6-11 is 4.1%--over 900,000 children aged 6-11 watched during the average minute of an episode each week in Season Two.

The average household rating is 2.2--over 2,072,000 households watched GHOSTWRITER during an average minute of an episode each week in Season Two.

Competition:

Based on children 6-11 ratings, GHOSTWRITER...

...ranked 26 out of a total of 82 commercial children's programs or outperformed two-thirds of all commercial children's programs.

...outperformed syndicated programs such as:

Darkwing Duck (3.1%)

Biker Mice from Mars (3.5%)

Transformers (3.2%)

Exosquad (2.3%)

New Adventures of Captain Planet (3.9%)

Nick News (0.9%)

...outperformed network Saturday morning programs such as:

Saved By the Bell (2.5%)

Running the Halls (1.5%)

California Dreams (1.7%)

Name Your Adventure (0.9%)

SEASON TWO VS. SEASON ONE*

GHOSTWRITER, Season Two generated...

... over a 20% increase in national household rating--a 2.3 rating vs a 1.9 rating for Season One

... over a 40% increase in the rating among children 6-11--a 4.5 rating vs. a 3.2 rating for Season One.

... approximately a 40% increase in the rating among children 2-11--a 4.0 rating vs. a 2.9 for Season One.

* A CHANGE IN THE MEASUREMENT: Since last season's ratings were tracked by the episode fed each week, better known as "episode-specific" carriage (valid only because most stations took the feed) - we found that for Season Two, this method understated total carriage and ratings because many stations actually played a variety of episodes in any given week. Therefore, CTW reordered last season's ratings - collecting them "generically" - ratings which reflected all viewing for any play of GHOSTWRITER, despite episode fed, for PBS peak season carriage weeks (October '92, November '92 and February '93). This exercise enabled us to compare GHOSTWRITER, Season One "apples-to-apples" with Season Two.





RATINGS FACTSHEET

ENDING SEASON TWO

(09/12/93 - 04/17/94)

NATIONAL CUMULATIVE AUDIENCE

A cumulative audience (cume) or reach is a measure of non-duplicated viewing by a household/person. To be counted, the household/person must tune to the program for six minutes or more.

In its second season, GHOSTWRITER . . .

- . . . reached 37.2 million persons 2+.
- . . . reached close to one in four U.S. TV households (24.2% or 22,800,000 TV households).
- . . . reached one in three children 6-11 (34.7% or 7,620,000).
- . . . reached one in four households with an income less than \$20,000 (25.3% or 7,200,000).
- . . . reached over one in four households with less than four years of high school (30.2% or 6,130,000).
- . . . reached close to 45% of all households with a child 6-11 (7,510,000 households w/ 6-11).
- . . . reached 42% of all African-American or of Spanish origin households with a child under 12 (2,780,000).
- . . . reached 46% of all households with a child under 12 and an income less than \$20,000 (3,220,000).

Season Two Vs. Season One

National Cumulative Audience during peak television viewing months of January & February:

During GHOSTWRITER's peak season GHOSTWRITER reached...

- ❶ ...17.7% of all households with an income less than \$15,000. A 67% increase when compared to the same period last year (3,690,000 for S2 vs 2,120,000 for S1).
- ❷ ...close to 20% of all households in which a head of house had less than four years of high school. A 54% increase over last year's result (3,980,000 for S2 vs. 2,470,000 for S1).
- ❸ ...a greater number of teens 12-17--about 50% more teens than Season One (2,320,000 for S2 vs. 1,530,000 for S1).
- ❹ ...more adults--close to 1.25 million more adults 18-54--compared to the same period last year (6,760,000 for S2 vs. 5,520,000 for S1).

Source: Nielsen Media Research





RATINGS FACTSHEET

ENDING SEASON TWO

(09/12/93 - 04/17/94)

LOCAL METERED MARKETS

The top rated metered market stations which aired GHOSTWRITER, Season Two at feed
(Sundays at 6:00 PM):

Rank	Market / Station	Avg. HH Rtg.
1	Portland / KOPB	2.2
2	New York / WNET	1.7
	Milwaukee / WMVS	1.7
4	Minn-St. Paul / KTCA	1.6
5	Boston / WGBH	1.5

Source: PMN TRAC - Nielsen Metered Market Overnight Ratings (9/12/93-4/17/94)

The top rated metered market stations which aired GHOSTWRITER, Season Two
in non-feed time slots:

Rank	Market / Station	Time Slot	Avg. HH Rtg.
1	Chicago / WTTW	Sun., 9-10 am	3.0
2	Dallas / KERA	Sun., 9-9:30 am	2.7
3	Houston / KUHT	Sun., 10-11 am	2.0
4	Seattle / KTCS	Sun., 9-9:30 am	1.9
5	Baltimore / WMPT	Sun., 10-11 am	1.8
	Atlanta / WGTW	Sat., 9-10 am	1.8

Source: PMN TRAC - Nielsen Metered Market Overnight Ratings (9/12/93-4/17/94)

Based on peak season local ratings (February 1994), the top rated metered market stations for
GHOSTWRITER, Season Two (ranked by children 6-11).

Rank	Market / Station	Time Slot	Avg. Ch 6-11 Rtg.
1	Portland / KOPB	Sun., 5-6 pm	12.0 / 46
	New York / WNET	Sun., 6-7 pm	12.0 / 28
3	Chicago / WTTW	Sun., 9-10 am	10.0 / 33
	Boston / WGBH	Sun., 6-7 pm	10.0 / 32
	Minn-St. Paul / KTCA	Sun., 6-7 pm	10.0 / 37
6	San Antonio / KLRN	Sun., 12-12:30pm	9.0 / 36
7	Atlanta / WGTW	Sat., 9-9:30 am	8.0 / 18
8	Phoenix / KAET	Sat., 12-12:30pm	7.0 / 47

Source: Nielsen Station Index, Viewer in Profile Report, February 1994

